

FILED

FORM TO BE USED BY A PRISONER IN FILING
A CIVIL RIGHTS COMPLAINT

2010 JUN -7 AM 11:38

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF OHIO

Oleon J. Huffman,
Plaintiff,

v.

Dollar Rent A Car,
Defendant.

Case No. **1:10CV1270**

JUDGE _____

COMPLAINT **JUDGE GWIN**

MAG. JUDGE GALLAS

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES ☐ **NO** ☒

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county):

3. Docket Number: _____

4. Name of judge to whom case was assigned _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?):

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: Cuyahoga County Jail

A. Is there a prisoner grievance procedure in this institution? ☒ YES ☐ NO

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? YES ☒ NO

C. If your answer is "yes",

1. What steps did you take? _____

2. What was the result? _____

D. If your answer is "no", explain why not:

Facts don't involve
institutional life.

E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? YES NO

F. If your answer is "yes",

1. What steps did you take? _____

2. What was the result? _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of the Plaintiff Oreon J. Huffman

Address 19214 Gladstone Rd., Warrensville Hts., Oh 44122

(In item B below, place the full name of the defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Use item C for the names, positions and places of employment of any additional defendants.)

B. Defendant Dollar Rent A Car ^{address} is employed at
19727 Maplewood Avenue at Cleveland, Ohio 44135

C. Additional Defendants

IV. Statement of Claim

(State here the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite

any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separated paragraph. Use as much space as you need. Attach extra sheet(s) if necessary.)

1. On April 18, 2008, Plaintiff executed a rental agreement with Defendant for a 2008 Dodge Charger, which was red in color and bearing KY plates #349HRX. EX. A. During the course of use, on April 26, 2008, Plaintiff was pulled over for fictitious plates and placed under arrest. EX. B1.

2. Plaintiff later sustained felony convictions from a search incident to arrest. Had proper plates been on vehicle, Plaintiff's liberty would have never been interrupted.

3. Defendant also exhibited substantial malice in refusing to provide Plaintiff with vehicle registration documentation during pendency of criminal trial. EX. B2 + B3. In fact, Defendant didn't send requested documentation until February 26, 2010. EX. A to C. This compounded Plaintiff's woes, because arresting officers

(Statement of Claim continued)

produced documentation which evinced KY plates # 349HRX went to a BLACK Dodge Charger, not red one rented by Plaintiff.

4. Trial judge's ruling not to suppress evidence, tested upon arrest incidental to the fictitious plates.

5. Plaintiff asserts that Defendant is liable for his convictions and punishment suffered, because they showed reckless disregard for his compulsory rights. Had Defendant forwarded Ex. A thru C when requested in Oct./2008, there stood a substantial probability he wouldn't have suffered convictions for allied offenses of similar import and punishment therefrom.

6. Plaintiff further asserts that there should not lie any issue(s) with statute of limitations, because he brings instant action under a theory of continuing violation - he still remains incarcerated pursuant to such.

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Do not give any legal arguments or cite any cases or statutes.)

Plaintiff seeks \$5,000,000.00 in monetary and punitive damages for the intrusion and incarceration suffered from receiving a product that was unlawful to have. Plus, for Defendant showing malice when questioned about legitimacy of the plates being on that particular vehicle.

Signed this 3rd day of June, 20 10.

I declare under penalty of perjury that the foregoing is true and correct.

6/3/10
Date

Orion J. Huffman
Signature of Plaintiff